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April 5, 2017

**BY ECF**

Hon. William M. Conley  
Chief Judge, United States District Court  
for the Western District of Wisconsin  
120 N. Henry Street, Room 320  
Madison, Wisconsin 53703

Re: *Consumer Financial Protection Bureau v. The Mortgage Law Group, LLP, et al.*,  
Case No. 3:14-cv-513-wmc

Dear Judge Conley:

We represent Consumer First Legal Group LLC, Thomas G. Macey, Jeffrey J. Aleman, Jason E. Searns, and Harold E. Stafford (collectively "Defendants") in the referenced action. On March 29, 2017, the Consumer Financial Protection Bureau ("CFPB") and one of the defendants, The Mortgage Law Group ("TMLG," represented by its trustee in bankruptcy), moved for entry of an order granting a stipulated final judgment and order against TMLG. (Dkt. #305) The 12-page proposed stipulated final judgment and order (dkt. #305-1), which the CFPB and the Trustee tendered to the Court, purports to be a final judgment against TMLG, assessing, among other things, civil penalties in excess of \$20 million. As the Court is aware, among the claims that the CFPB asserts against defendants Macey and Aleman in this action are claims seeking to hold Macey and Aleman liable for actions of TMLG.

As the motion to enter the stipulated final judgment and order expressly states, the proposed final judgment is tendered to effectuate a stipulated judgment reached by the CFPB and the Trustee, and approved by the United States Bankruptcy Court for the Northern District of Illinois, to settle the CFPB's claims against TMLG in *In re Estate of The Mortgage Law Group, L.L.P.*, Case No. 14-12825. (Dkts. #305 ¶ 11, and #305-1, Exh. A) Macey and Aleman, two of the defendants in this action, are also parties to the bankruptcy action in which the stipulated judgment was entered. Moreover, Macey and Aleman, who have an interest in the stipulated judgment entered by the bankruptcy court, have appealed the bankruptcy court's entry of the stipulated judgment. (See dkt. #305 ¶ 13.)

Typically, Defendants would respond to a motion seeking entry of a stipulated final judgment within seven days of filing and service. However, neither counsel for the CFPB, nor

counsel for the Trustee, met and conferred with counsel for Macey and Aleman before filing their motion, and counsel for Macey and Aleman have been fully occupied preparing objections and counter-designations to the CFPB's deposition designations, objections to the CFPB's list of more than 600 trial exhibits, and other filings, to meet the Court's April 10, 2017 deadline and to prepare for the trial of this action, which commences on April 24. Consequently, counsel for Macey and Aleman have not yet been able to submit a response to the motion for an order granting the stipulated final judgment against TMLG, but intend to do so no later than Monday, April 10. We respectfully request that the Court refrain from ruling on the pending motion until Macey and Aleman have filed their response.

Very truly yours,

/s/ Douglas M. Poland

Douglas M. Poland

*One of the Attorneys for defendants, Consumer  
First Legal Group LLC, Thomas G. Macey, Jeffrey  
J. Aleman, Jason E. Searns, and Harold E. Stafford*

cc: All Counsel of Record (by ECF)